

EXHIBIT 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

HORACE MORRIS, LINDA MORRONE,
GEORGE JEBRINE, ANDREA MOWATT,
BRIAN MULDOWNNEY, KEVIN
MULDOWNNEY, TIMOTHY MULDOWNNEY,
ANNE MULDOWNNEY, MARY
MULDOWNNEY, COLLEEN ANDELLO,
PATRICIA MULLIGAN, MICHAEL
MURRAY, CHRISTOPHER NARDONE,
ROXANNE NEDD, RYAN NELSON,
LESLIE NESBITT, MARIE NEVINS, MAN
NGO, ROBERT OGREN, JOHN OITICE,
DUANE ORLOSKE, ILLIANETTE ORTIZ,
JONATHAN ORTIZ, SOPHIE ORTIZ,
PABLO ORTIZ, MARIA FERNANDEZ,
KAREN PABON, NORMAN WELLS, LENO
PARHAM, KEVIN PARHAM, SANDRA
PATROCINO, DORIE PEARLMAN,
MARIANA Z. PEREZ, MARIO PEREZ,
MELISSA PERRY, PEGGY PERRY, ROBIN
PETERSON, TARA FELICE, THOMAS
KNOBEL, CRAIG POHLMANN, ADELA
ROMERO, ZACHARY PORTILLO,
MAUREEN PUGLIESE, ROBERT PYCIOR,
JOSEPH PYCIOR, JANE QUAPPE, BRUCE
TOOKER, JAMES BURO, JOHN
RAMSAUR, JAMES RESZKE, J.A.
REYNOLDS, THERESA RICCARDELLI,
BRIAN KEEGAN, RENEE BALDWIN,
MAZIE LAWSON, CYNTHIA LAWSON,
VALERIE WALLS, MONICA L. LAWSON,
HOPETON RICHARDS, DONNA RIVELLI,
JOSEPH SR. RIVELLI, LUIS RIVERA,
RIVERA JOSEJENNIFER COBB
MCLENZIE, VANESSA PHILLIPS, DANIEL
RODRIGUEZ, SHAVONNE COBB,
FLOSSIE J. FOSTER, ARNULFO
RODRIGUEZ, SANDRA ROMAGNOLO,
JENNIFER HOROWITZ, STACEY ROY-
CHRIST, SHANNON RUBACK, DAVID

Civil Docket Number: _____

**SHORT FORM COMPLAINT AND
DEMAND FOR TRIAL BY JURY**

ECF CASE

RUBACK, GINA RUBACK, HILLARY
HANS, FRANK RUGGIERO, DELORES
RUSSO, FRANK SAIYA, MADELINE
REED, MICHAEL SALAMONE, BENEDICT
SALAMONE, CATHERINE SAUR,
MICHELLE CATALINE, CARLOS SALAS,
HALEEMA SALIE, EDISON SALOMON,
DANIA SALOMON MACHARIE, JAMES
SALOMON, ANTOINE SALOMON,
MICHELLE SANAY, HUGO SANAY,
STEVEN SANAY, CLARA SANAY,
NATALIE JEFFRIES, JOHN SAVAS,
CASSANDRA NASH, JOAN SCHEFFOLD,
DAWN SCHLEGEL,

PLAINTIFFS,

v.

ISLAMIC REPUBLIC OF IRAN,

DEFENDANT.

IRAN SHORT FORM COMPLAINT

Plaintiffs file this Short Form Complaint against Defendant Islamic Republic of Iran (“Iran”) arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”) as named herein by and through the undersigned counsel.

Plaintiffs incorporates by reference the specific allegations, as indicated below, of the *Burnett, et al. v. Islamic Republic of Iran et al.*, Amended Complaint, 15-cv-9903 (S.D.N.Y.) (GBD) (SN) Doc. No. 53 (hereinafter the “*Burnett* Iran Complaint”).

Plaintiffs file this *Iran Short Form Complaint* as permitted and approved by the Court’s Order of May 25, 2018, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Upon filing of this *Iran Short Form Complaint*, Plaintiffs are deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all

causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, Plaintiffs incorporate the factual allegations and findings contained in those pleadings and orders filed, *inter alia*, at *Havlish v. Bin Laden*, Docket No. 1:03-cv-9848, ECF Nos. 263, 294, 295 (S.D.N.Y. Dec. 22, 2011); *Havlish v. Bin Laden*, 03 MDL 1570, ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before Hon. George B. Daniels on December 15, 2011 (ECF No. 2540).

This *Iran Short Form Complaint* relates solely to Defendant Iran, and does not apply to any other defendant.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act) and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Plaintiffs hereby adopt and incorporate by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ *Ashton Iran Complaint*, Docket Number 02-cv-6977 (S.D.N.Y.) (GBD)(SN) (03-md-1570 ECF Doc. No. 3237)

X *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53)

4. In addition, Plaintiffs hereby assert the following additional causes of action:

X *Iran Short Form Complaint* First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiffs allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

☐ *Iran Short Form Complaint* First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

5. Plaintiffs are making such claim on the following basis, and incorporates by reference that supplemental information provided on Appendix 1 to the *Iran Short Form Complaint*, identifying the Plaintiffs asserted basis for participating in this suit:

- ☒ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF PLAINTIFFS

6. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this *Iran Short Form Complaint*, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this *Iran Short Form Complaint*.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this *Iran Short Form Complaint*, and as further asserted within this *Iran Short Form Complaint*.
- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, related to the September 11, 2001 Terrorist Attacks, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered

bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the *Iran Short Form Complaint*, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.

- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or personal injury claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each plaintiff.

IDENTIFICATION OF THE DEFENDANT

7. The only Defendant named in this *Short Form Complaint* is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

8. By filing this *Short Form Complaint*, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.

9. By filing this *Iran Short Form Complaint*, Plaintiffs are not opting out of any class that the Court may certify in the future.

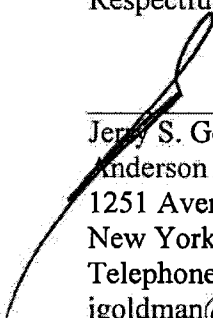
WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in the *Burnett Iran Complaint*, as indicated above.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to the claims in this action.

Dated: June 12, 2018

Respectfully submitted,



Jerry S. Goldman
Anderson Kill P.C.
1251 Avenue of the Americas
New York, New York
Telephone: 212-278-1000
jgoldman@andersonkill.com
Attorneys for Plaintiffs

See Appendix 1 Annexed

APPENDIX 1 TO THE IRAN SHORT FORM COMPLAINT

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Burnett* Amended Complaint as noted in the Iran Short Form Complaint to which this Appendix is appended. All allegations below shall be referenced as Allegation 1 of Appendix 1 to Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	Morris, Horace	MD	Morris, Odessa V.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
2	Morrone, Linda	FL	Morrone, Ferdinand	Spouse/PR	United States	United States	Solatium/ Wrongful Death
3	Jebrine, George	CT	Moussa, Jude	PR	United States	United States	Wrongful Death
4	Mowatt, Andrea	NY	Mowatt, Damion	Mother/PR	United States	Jamaica	Solatium/ Wrongful Death
5	Muldowney, Brian	FL	Muldowney, Richard Jr.	Brother	United States	United States	Solatium
6	Muldowney, Kevin	NY	Muldowney, Richard Jr.	Brother	United States	United States	Solatium
7	Muldowney, Timothy	FL	Muldowney, Richard Jr.	Brother	United States	United States	Solatium
8	Muldowney, Anne	FL	Muldowney, Richard Jr.	Mother	United States	United States	Solatium
9	Muldowney, Mary	NY	Muldowney, Richard Jr.	Sister	United States	United States	Solatium
10	Andello, Colleen	FL	Muldowney, Richard Jr.	Sister	United States	United States	Solatium
11	Mulligan, Patricia	NY	Mulligan, Dennis M.	Sister/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
12	Murray, Michael	WI	Murray, Valerie V.	Son/PR	United States	United States	Solatium/ Wrongful Death
13	Nardone, Christopher	NY	Nardone, Mario	Brother	United States	United States	Solatium
14	Nedd, Roxanne	NY	Nedd, Jerome O.	Spouse/PR	Guyana	Trinidad	Solatium/ Wrongful Death
15	Nelson, Ryan	NY	Nelson, Peter A.	Son	United States	United States	Solatium
16	Nesbitt, Leslie	NY	Nesbitt, Oscar F.	Brother/PR	United States	United States	Solatium/ Wrongful Death
17	Nevins, Marie	NY	Nevins, Gerard T.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
18	Ngo, Man	NJ	Ngo, Nancy Yuen	Spouse/PR	United States	United States	Solatium/ Wrongful Death
19	Ogren, Robert	FL	Ogren, Joseph J.	Father	United States	United States	Solatium
20	Oitice, John	NY	Oitice, Samuel	Son/PR	United States	United States	Solatium/ Wrongful Death
21	Orloske, Duane	CT	Orloske, Margaret	Spouse/PR	United States	United States	Solatium/ Wrongful Death
22	Ortiz, Illianette	NY	Ortiz, David	Spouse/PR	United States	United States	Solatium/ Wrongful Death
23	Ortiz, Jonathan	NY	Ortiz, Paul Jr.	Brother	United States	United States	Solatium
24	Ortiz, Sophie	NJ	Ortiz, Paul Jr.	Mother	United States	United States	Solatium
25	Ortiz, Pablo	NJ	Ortiz, Paul Jr.	Father	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
26	Fernandez, Maria	Dominican Republic	Ottenwalder, Isidro D.	Spouse/PR	Dominican Republic	United States	Solatium/ Wrongful Death
27	Pabon, Karen	NJ	Pabon, Israel	Spouse/PR	Scotland	United States	Solatium/ Wrongful Death
28	Wells, Norman	OK	Pak-Wells, Chin Sun	Father/PR	United States	United States	Solatium/ Wrongful Death
29	Parham, Leno	MD	Parham, James W.	Brother	United States	United States	Solatium
30	Parham, Kevin	NJ	Parham, James W.	Brother	United States	United States	Solatium
31	Patrocino, Sandra	NY	Patrocino, Manuel D.	Spouse/PR	Dominican Republic	Dominican Republic	Solatium/ Wrongful Death
32	Pearlman, Dorie	NY	Pearlman, Richard A.	Mother/PR	United States	United States	Solatium/ Wrongful Death
33	Perez, Mariana Z.	Dominican Republic	Perez, Alejo	Spouse/PR	United States	Dominican Republic	Solatium/ Wrongful Death
34	Perez, Mario	NJ	Perez, Nancy E.	Father/PR	United States	United States	Solatium/ Wrongful Death
35	Perry, Melissa	NY	Perry, Emelda	Mother/PR	United States	United States	Solatium/ Wrongful Death
36	Perry, Peggy	NY	Perry, Glen Sr.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
37	Peterson, Robin	NY	Peterson, William R.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
38	Felice, Tara	NY	Pettit, Glen	Sister/PR	United States	United States	Solatium/ Wrongful Death
39	Knobel, Thomas	NY	Pham, Tu- Anh	Spouse/PR	United States	United States	Solatium/ Wrongful Death
40	Pohlmann, Craig	FL	Pohlmann, William H.	Son	United States	United States	Solatium
41	Romero, Adela	NY	Porras, Giovanna	Mother/PR	United States	United States	Solatium/ Wrongful Death
42	Portillo, Zachary	GA	Portillo, Anthony	Brother	United States	United States	Solatium
43	Pugliese, Maureen	NY	Pugliese, Robert D.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
44	Pycior, Robert	NJ	Pycior, Joseph J.	Son	United States	United States	Solatium
45	Pycior, Joseph	NJ	Pycior, Joseph J.	Son	United States	United States	Solatium
46	Quappe, Jane	NY	Quappe, Lincoln	Spouse/PR	United States	United States	Solatium
47	Tooker, Bruce	NY	Quappe, Lincoln	Step- father/PR	United States	United States	Solatium/ Wrongful Death
48	Buro, James	MA	Ragonese- Snik, Laura	Son	United States	United States	Solatium
49	Ramsaur, John	PA	Ramsaur, Deborah	Spouse/PR	United States	United States	Solatium/ Wrongful Death
50	Reszke, James	AZ	Reszke, Martha M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
51	Reynolds, J.A.	NY	Reynolds, Bruce A.	Father	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
52	Riccardelli, Theresa	NJ	Riccardelli, Francis	Spouse/PR	United States	United States	Solatium/ Wrongful Death
53	Keegan, Brian	NY	Rice, Eileen M.	Son/PR	United States	United States	Solatium/ Wrongful Death
54	Baldwin, Renee	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
55	Lawson, Mazie	MD	Richard, Cecelia E.	Mother	United States	United States	Solatium
56	Lawson, Cynthia	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
57	Walls, Valerie	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
58	Lawson, Monica L.	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
59	Richards, Hopeton	NJ	Richards, Venesha	Spouse/PR	United States	United States	Solatium/ Wrongful Death
60	Rivelli, Donna	NY	Rivelli, Joseph Jr.	Mother	United States	United States	Solatium
61	Rivelli, Joseph Sr.	FL	Rivelli, Joseph Jr.	Father	United States	United States	Solatium
62	Rivera, Luis	NY	Rivera, Carmen A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
63	Rivera Jose	FL	Rivera, Linda I.	Father/PR	United States	United States	Solatium/ Wrongful Death
64	Cobb McLenzie, Jennifer	TX	Rodriguez, Marsha A	Daughter	United States	United States	Solatium
65	Phillips, Vanessa	FL	Rodriguez, Marsha A	Sister	United States	United States	Solatium
66	Rodriguez, Daniel	GA	Rodriguez, Marsha A	Spouse	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
67	Cobb, Shavonne	TX	Rodriguez, Marsha A.	Daughter	United States	United States	Solatium
68	Foster, Flossie J.	FL	Rodriguez, Marsha A.	Mother	United States	United States	Solatium
69	Rodriguez, Arnulfo	NY	Rodriguez, Mayra V.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
70	Romagnolo, Sandra	NY	Romagnolo, Joseph M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
71	Horowitz, Jennifer	NJ	Rosenberg, Mark L.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
72	Roy-Christ, Stacey	NY	Roy, Timothy A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
73	Ruback, Shannon	NY	Ruback, Paul G.	Daughter	United States	United States	Solatium
74	Ruback, David	NY	Ruback, Paul G.	Son	United States	United States	Solatium
75	Ruback, Gina	NY	Ruback, Paul G.	Daughter	United States	United States	Solatium
76	Hans, Hillary	NJ	Ruben, Ronald J.	Sister/PR	United States	United States	Solatium/ Wrongful Death
77	Ruggiero, Frank	NY	Ruggiero, Susan A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
78	Russo, Delores	PA	Russo, Michael	Mother	United States	United States	Solatium
79	Saiya, Frank	KS	Saiya, Edward	Brother	United States	United States	Solatium
80	Reed, Madeline	NC	Salamone, John P.	Mother	United States	United States	Solatium
81	Salamone, Michael	NC	Salamone, John P.	Brother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
82	Salamone, Benedict	SC	Salamone, John P.	Father	United States	United States	Solatium
83	Saur, Catherine	NC	Salamone, John P.	Sister	United States	United States	Solatium
84	Cataline, Michelle	NC	Salamone, John P.	Sister	United States	United States	Solatium
85	Salas, Carlos	NY	Salas, Hernando R.	Son/PR	United States	United States	Solatium/ Wrongful Death
86	Salie, Haleema	MA	Salie, Rahma	Mother/PR	Sri Lanka	Sri Lanka	Solatium/ Wrongful Death
87	Salomon, Edison	FL	Salomon, Nolbert	Brother	Haiti	Haiti	Solatium
88	Salomon Macharie, Dania	FL	Salomon, Nolbert	Sister	United States	Haiti	Solatium
89	Salomon, James	NY	Salomon, Nolbert	Brother	Haiti	Haiti	Solatium
90	Salomon, Antoine	FL	Salomon, Nolbert	Father	Haiti	Haiti	Solatium
91	Sanay, Michelle	NY	Sanay, Hugo	Daughter	United States	United States	Solatium
92	Sanay, Hugo	NY	Sanay, Hugo	Son	Ecuador	United States	Solatium
93	Sanay, Steven	NY	Sanay, Hugo	Son	United States	United States	Solatium
94	Sanay, Clara	NY	Sanay, Hugo	Spouse	Ecuador	United States	Solatium
95	Jeffries, Natalie	GA	Sanchez, Alva Cynthia Jeffries	Sister	United States	United States	Solatium
96	Savas, John	NY	Savas, Anthony	Son	United States	United States	Solatium
97	Nash, Cassandra	NY	Savas, Anthony	Daughter	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
98	Scheffold, Joan	NY	Scheffold, Frederick C.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
99	Schlegel, Dawn	VA	Schlegel, Robert A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

28 USC 1608 Summons IH 6

4/17

UNITED STATES DISTRICT COURT
for the
Southern District of New York

HORACE MORRIS, ET AL. (see
appendix)

Plaintiff

v.

ISLAMIC REPUBLIC OF IRAN

Defendant

)
)
)
)
)
)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ISLAMIC REPUBLIC OF IRAN,
c/o Permanent Mission of Iran
to the United Nations
622 Third Avenue
New York, NY 10017

A lawsuit has been filed against you.

Within 60 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
(212) 278-1000
jgoldman@andersonkill.com

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

28 USC 1608 Summons (12/11) (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

▸ I personally served the summons on the individual at *(place)* _____
 on *(date)* _____; or

▸ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

▸ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 on *(date)* _____; or

▸ I returned the summons unexecuted because _____; or

▸ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

APPENDIX

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	Morris, Horace	MD	Morris, Odessa V.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
2	Morrone, Linda	FL	Morrone, Ferdinand	Spouse/PR	United States	United States	Solatium/ Wrongful Death
3	Jebrine, George	CT	Moussa, Jude	PR	United States	United States	Wrongful Death
4	Mowatt, Andrea	NY	Mowatt, Damion	Mother/PR	United States	Jamaica	Solatium/ Wrongful Death
5	Muldowney, Brian	FL	Muldowney, Richard Jr.	Brother	United States	United States	Solatium
6	Muldowney, Kevin	NY	Muldowney, Richard Jr.	Brother	United States	United States	Solatium
7	Muldowney, Timothy	FL	Muldowney, Richard Jr.	Brother	United States	United States	Solatium
8	Muldowney, Anne	FL	Muldowney, Richard Jr.	Mother	United States	United States	Solatium
9	Muldowney, Mary	NY	Muldowney, Richard Jr.	Sister	United States	United States	Solatium
10	Andello, Colleen	FL	Muldowney, Richard Jr.	Sister	United States	United States	Solatium
11	Mulligan, Patricia	NY	Mulligan, Dennis M.	Sister/PR	United States	United States	Solatium/ Wrongful Death
12	Murray, Michael	WI	Murray, Valerie V.	Son/PR	United States	United States	Solatium/ Wrongful Death
13	Nardone, Christopher	NY	Nardone, Mario	Brother	United States	United States	Solatium
14	Nedd, Roxanne	NY	Nedd, Jerome O.	Spouse/PR	Guyana	Trinidad	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
15	Nelson, Ryan	NY	Nelson, Peter A.	Son	United States	United States	Solatium
16	Nesbitt, Leslie	NY	Nesbitt, Oscar F.	Brother/PR	United States	United States	Solatium/ Wrongful Death
17	Nevins, Marie	NY	Nevins, Gerard T.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
18	Ngo, Man	NJ	Ngo, Nancy Yuen	Spouse/PR	United States	United States	Solatium/ Wrongful Death
19	Ogren, Robert	FL	Ogren, Joseph J.	Father	United States	United States	Solatium
20	Oitice, John	NY	Oitice, Samuel	Son/PR	United States	United States	Solatium/ Wrongful Death
21	Orloske, Duane	CT	Orloske, Margaret	Spouse/PR	United States	United States	Solatium/ Wrongful Death
22	Ortiz, Illianette	NY	Ortiz, David	Spouse/PR	United States	United States	Solatium/ Wrongful Death
23	Ortiz, Jonathan	NY	Ortiz, Paul Jr.	Brother	United States	United States	Solatium
24	Ortiz, Sophie	NJ	Ortiz, Paul Jr.	Mother	United States	United States	Solatium
25	Ortiz, Pablo	NJ	Ortiz, Paul Jr.	Father	United States	United States	Solatium
26	Fernandez, Maria	Dominican Republic	Ottenwalder, Isidro D.	Spouse/PR	Dominican Republic	United States	Solatium/ Wrongful Death
27	Pabon, Karen	NJ	Pabon, Israel	Spouse/PR	Scotland	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
28	Wells, Norman	OK	Pak-Wells, Chin Sun	Father/PR	United States	United States	Solatium/ Wrongful Death
29	Parham, Leno	MD	Parham, James W.	Brother	United States	United States	Solatium
30	Parham, Kevin	NJ	Parham, James W.	Brother	United States	United States	Solatium
31	Patrocino, Sandra	NY	Patrocino, Manuel D.	Spouse/PR	Dominican Republic	Dominican Republic	Solatium/ Wrongful Death
32	Pearlman, Dorie	NY	Pearlman, Richard A.	Mother/PR	United States	United States	Solatium/ Wrongful Death
33	Perez, Mariana Z.	Dominican Republic	Perez, Alejo	Spouse/PR	United States	Dominican Republic	Solatium/ Wrongful Death
34	Perez, Mario	NJ	Perez, Nancy E.	Father/PR	United States	United States	Solatium/ Wrongful Death
35	Perry, Melissa	NY	Perry, Emelda	Mother/PR	United States	United States	Solatium/ Wrongful Death
36	Perry, Peggy	NY	Perry, Glen Sr.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
37	Peterson, Robin	NY	Peterson, William R.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
38	Felice, Tara	NY	Pettit, Glen	Sister/PR	United States	United States	Solatium/ Wrongful Death
39	Knobel, Thomas	NY	Pham, Tu- Anh	Spouse/PR	United States	United States	Solatium/ Wrongful Death
40	Pohlmann, Craig	FL	Pohlmann, William H.	Son	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
41	Romero, Adela	NY	Porras, Giovanna	Mother/PR	United States	United States	Solatium/ Wrongful Death
42	Portillo, Zachary	GA	Portillo, Anthony	Brother	United States	United States	Solatium
43	Pugliese, Maureen	NY	Pugliese, Robert D.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
44	Pycior, Robert	NJ	Pycior, Joseph J.	Son	United States	United States	Solatium
45	Pycior, Joseph	NJ	Pycior, Joseph J.	Son	United States	United States	Solatium
46	Quappe, Jane	NY	Quappe, Lincoln	Spouse/PR	United States	United States	Solatium
47	Tooker, Bruce	NY	Quappe, Lincoln	Step- father/PR	United States	United States	Solatium/ Wrongful Death
48	Buro, James	MA	Ragonese- Snik, Laura	Son	United States	United States	Solatium
49	Ramsaur, John	PA	Ramsaur, Deborah	Spouse/PR	United States	United States	Solatium/ Wrongful Death
50	Reszke, James	AZ	Reszke, Martha M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
51	Reynolds, J.A.	NY	Reynolds, Bruce A.	Father	United States	United States	Solatium
52	Riccardelli, Theresa	NJ	Riccardelli, Francis	Spouse/PR	United States	United States	Solatium/ Wrongful Death
53	Keegan, Brian	NY	Rice, Eileen M.	Son/PR	United States	United States	Solatium/ Wrongful Death
54	Baldwin, Renee	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
55	Lawson, Mazie	MD	Richard, Cecelia E.	Mother	United States	United States	Solatium
56	Lawson, Cynthia	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
57	Walls, Valerie	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
58	Lawson, Monica L.	MD	Richard, Cecelia E.	Sister	United States	United States	Solatium
59	Richards, Hopeton	NJ	Richards, Venesha	Spouse/PR	United States	United States	Solatium/ Wrongful Death
60	Rivelli, Donna	NY	Rivelli, Joseph Jr.	Mother	United States	United States	Solatium
61	Rivelli, Joseph Sr.	FL	Rivelli, Joseph Jr.	Father	United States	United States	Solatium
62	Rivera, Luis	NY	Rivera, Carmen A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
63	Rivera Jose	FL	Rivera, Linda I.	Father/PR	United States	United States	Solatium/ Wrongful Death
64	Cobb McLenzie, Jennifer	TX	Rodriguez, Marsha A	Daughter	United States	United States	Solatium
65	Phillips, Vanessa	FL	Rodriguez, Marsha A	Sister	United States	United States	Solatium
66	Rodriguez, Daniel	GA	Rodriguez, Marsha A	Spouse	United States	United States	Solatium
67	Cobb, Shavonne	TX	Rodriguez, Marsha A.	Daughter	United States	United States	Solatium
68	Foster, Flossie J.	FL	Rodriguez, Marsha A.	Mother	United States	United States	Solatium
69	Rodriguez, Amulfo	NY	Rodriguez, Mayra V.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
70	Romagnolo, Sandra	NY	Romagnolo, Joseph M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
71	Horowitz, Jennifer	NJ	Rosenberg, Mark L.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
72	Roy-Christ, Stacey	NY	Roy, Timothy A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
73	Ruback, Shannon	NY	Ruback, Paul G.	Daughter	United States	United States	Solatium
74	Ruback, David	NY	Ruback, Paul G.	Son	United States	United States	Solatium
75	Ruback, Gina	NY	Ruback, Paul G.	Daughter	United States	United States	Solatium
76	Hans, Hillary	NJ	Ruben, Ronald J.	Sister/PR	United States	United States	Solatium/ Wrongful Death
77	Ruggiero, Frank	NY	Ruggiero, Susan A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
78	Russo, Delores	PA	Russo, Michael	Mother	United States	United States	Solatium
79	Saiya, Frank	KS	Saiya, Edward	Brother	United States	United States	Solatium
80	Reed, Madeline	NC	Salamone, John P.	Mother	United States	United States	Solatium
81	Salamone, Michael	NC	Salamone, John P.	Brother	United States	United States	Solatium
82	Salamone, Benedict	SC	Salamone, John P.	Father	United States	United States	Solatium
83	Saur, Catherine	NC	Salamone, John P.	Sister	United States	United States	Solatium
84	Cataline, Michelle	NC	Salamone, John P.	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
85	Salas, Carlos	NY	Salas, Hernando R.	Son/PR	United States	United States	Solatium/ Wrongful Death
86	Salie, Haleema	MA	Salie, Rahma	Mother/PR	Sri Lanka	Sri Lanka	Solatium/ Wrongful Death
87	Salomon, Edison	FL	Salomon, Nolbert	Brother	Haiti	Haiti	Solatium
88	Salomon Macharie, Dania	FL	Salomon, Nolbert	Sister	United States	Haiti	Solatium
89	Salomon, James	NY	Salomon, Nolbert	Brother	Haiti	Haiti	Solatium
90	Salomon, Antoine	FL	Salomon, Nolbert	Father	Haiti	Haiti	Solatium
91	Sanay, Michelle	NY	Sanay, Hugo	Daughter	United States	United States	Solatium
92	Sanay, Hugo	NY	Sanay, Hugo	Son	Ecuador	United States	Solatium
93	Sanay, Steven	NY	Sanay, Hugo	Son	United States	United States	Solatium
94	Sanay, Clara	NY	Sanay, Hugo	Spouse	Ecuador	United States	Solatium
95	Jeffries, Natalie	GA	Sanchez, Alva Cynthia Jeffries	Sister	United States	United States	Solatium
96	Savas, John	NY	Savas, Anthony	Son	United States	United States	Solatium
97	Nash, Cassandra	NY	Savas, Anthony	Daughter	United States	United States	Solatium
98	Scheffold, Joan	NY	Scheffold, Frederick C.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
99	Schlegel, Dawn	VA	Schlegel, Robert A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death

IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Horace Morris, et al.

Plaintiff	Case Number
vs.	1:18-cv-05321
Islamic Republic of Iran	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

In re Terrorist Attacks on September 11,
2001

Plaintiff	Case Number
vs.	03 MDL 1570 (GBD)(SN)
Defendant	

IH-32

Rev: 2014-1

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

Partial and/or full summary judgment as to Defendant Islamic Republic of Iran has been granted and ordered for select plaintiffs. This matter is still ongoing. On May 25, 2018, the Court entered an Order approving the "Iran Short Form Complaint" that is filed herewith. (See ECF No. 4010 in 1:03-md-01570-GBD-SN).

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This is also a September 11th case for wrongful death that is against the sponsors of terrorism as the Defendant Islamic Republic of Iran is involved in the related MDL action. We are seeking similar relief in the form of damages from the Defendant. The Plaintiffs herein intend to participate in the underlying litigations as to the other defendants in due course. This case is also related to Estate of John Patrick O'Neill Sr., et al. v The Republic of Iraq, et al., 04-1076-GBN-SN; Thomas E. Burnett, Sr., in his own right as the Parent of Thomas E. Burnett, Jr., Deceased, et al. v. The Islamic Republic of Iran, et al., 15-cv-09903-GBN-SN; and Kathleen Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-06977-GBN-FM. The instant complaint is being filed in accordance with the Court's directive of May 25, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Signature: _____

Jerry S. Goldman, Esq.
Anderson Kill P.C.

Date: June 17, 2018

Firm: _____